

EXHIBIT A

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July 23, 2009

VIA E-MAIL

Ryan McCrum, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114-1190

Re: Sony Corporation v. Vizio, Inc.

Dear Ryan:

I write to follow-up the parties' meet and confer today with respect to the issue of Vizio's obligation to search for technical documents in its control but in the physical possession of AmTRAN Technology, Co. Ltd. Sony offered to provide case law relating to this topic. Cases include the following:

Super Film of America, Inc. v. UCB Films, Inc., 219 F.R.D. 649 (D. Kan. 2004).

Afros S.P.A. v. Krauss-Maffei Corporation, 113 F.R.D. 127 (D. Del. 1986).

Bank of New York v. Meridien BIAO Bank Tanzania Ltd., 171 F.R.D. 135 (S.D.N.Y. 1997).

Hitachi, Ltd. v. AmTRAN Technology Co. Ltd., 2006 WL 2038248 (N.D. Cal. 2006).

Synopsys, Inc. v. Ricoh Co. Ltd., 2006 WL 1867529 (N.D. Cal. 2006).

Duran v. Cisco Systems, Inc., ---F. Supp. 2d ---, 2009 WL 2043516 (C.D. Cal. July 1, 2009).

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Kamatani v. BenQ Corp., No. 2:03-CV-437, 2005 WL 2455825 (E.D. Tex. 2006).

In today's meet and confer, contingent on your review of the above case law, you offered to search for documents at AmTRAN that were technical in nature. Although Sony reserves the right to request in the future that Vizio search for other non-technical documents at AmTRAN, Sony agrees that Vizio is not required to carry out wide-ranging searches at AmTRAN to locate documents responsive to all of Sony's document requests. Rather, at this time, Sony agrees that Vizio need only look for technical documents. Should Sony believe that additional categories of documents need to be searched for in the future, Sony will work with Vizio to narrowly tailor any such document searches.

With respect to technical documents, you mentioned today certain types of technical documents that Vizio would endeavor to locate at AmTRAN. Sony generally agrees with the document categories discussed at the meet and confer, but states that at a minimum, Vizio would need to endeavor to locate at AmTRAN the following documents, for each accused product:

- User manuals and service manuals, if not already produced
- IC data sheets, specifications, and schematics of the type generally in the possession of a television manufacturer
- Source code including: software code, firmware, Register Transfer Language (RTL), and Hardware Design Language (HDL) code
- Product design documents
- Product specification sheets
- Any other technical documents responsive to Sony's requests that are located while the above documents are being searched for

Of course, Sony requests the above documents only for accused products that were manufactured by AmTRAN.

Based on your comments at today's meet and confer, it is Sony's understanding that contingent upon your review of the above case law, Vizio will make a good faith effort to locate the above documents and produce them to Sony. Please let us know by tomorrow, July 24, 2009, whether Vizio will be requesting the above-described documents of AmTRAN. If Vizio does agree to produce such documents, Sony requests that Vizio produce them no later than August 10, 2009. Please note that if Vizio does not agree to search for these documents, then Sony considers the parties to be at an impasse on this issue.

Very truly yours,

/s/

Peter Klivans